

United States District Court  
Eastern District of Missouri  
Eastern Division

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APR 13 2023

BY MAIL

Alexander Howell )

vs ) civil action no. \_\_\_\_\_  
Rachel Gettinger ) request jury by trial yes  no

Civil Complaint

I. Jurisdiction & Venue

1. This civil action is authorized by 42 U.S.C. Section 1983 to redress the deprivation, under color of state law, of rights secured by the Constitution of the United States. The court has jurisdiction under 28 U.S.C. Section 1331 and 1333(a)(3). Plaintiff seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff's claims for injunctive relief are authorized by 28 U.S.C. Section 2283 & 2284 and Rule 65 of the Federal Rules of Civil Procedure.

2. The Eastern District of Missouri, is an appropriate venue under 28 U.S.C. Section 1331 (b)(2), because it is where the events giving rise to this claim occurred.

II. Plaintiffs

3. Plaintiff, Alexander Howell, is and was at all times mentioned herein a prisoner at the State of Missouri, on the custody of Missouri Department of Corrections. As an identified trans-woman, she is currently confined in Petrol Correctional Center (for males), in Mineral Point, Missouri.

### III. Defendants

4. Defendant, Rachel Gettinger is the Correctional Casemanager in Petoski Correctional Center for housing unit 1 and the infirmary. She is legally responsible for the social work that involves the prisoners within the housing unit 1 and infirmary. She is being sued in both official and individual capacity.

### IV. Facts

5. On March 23, 2023 correctional casemanager Rachel Gettinger conducted a housing unit "round".

6. After speaking with me of my concerns (cell 1B-17), she moved on to the next cell. That offender is Nicholas Ingram #1268339, located in cell 1B-18.

7. While speaking to this offender, she denied him the right to an wr for denial to be accepted into the transgender committee.

8. She then relayed to Ingram that "we know you and Howell are up to something, she thinks hes smarter than us. He just got reapproved to the transgender committee in ~~December~~ November.

9. He then again requested for an wr.

10. She then responded, "no y'all on some bulletit. we know you trying to get the items to sell to him-hes. How much is she paying you for it?"

11. Nicholas responded ~~to~~, "I don't know what you talking about."

12. At this point in time she moved on to the next cell 1B-19, Savonteria Jones.

13. Later that day a bunch of offenders and I got into a debate.

14. Prisoner Ingram and I cursed eachother about being gay as an all around topic.

15. At some point he told me what I assumed I heard stating "Ms. Gettinger said you was just reapproved for the transgender committee in November. Aye Troy-5 did she or did she not?"

17. Iagoam then replied by saying, "Right. Fake as  
transgender."

18. Right afterwards I continued to try to defend myself  
telling them she was lying and that there was a reason for  
the "reapproval that occurred in January 2023 due to the  
switching of companies from Concor to Centurion."

19. Multiple offenders began calling me a "Fake as Fag" and  
a "boy."

20. Thoughts of self castration of the penile area occurred.  
occurred. It also exacerbated my depression and mood swings.

21. An IHO was filed.

## VI. Legal Claims

22. Rachel Gettinger violated the eighth amendment  
and fourteenth amendment by disclosure to another offender  
the medical confidentiality status of the hormonal therapy  
that cause hostility and intolerance from others.

23. Rachel Gettinger disclosed confidential information  
in front of other offenders alleged a privacy violation of  
the fourteenth amendment.

## V. Prayer for Relief

Wherefore, Plaintiff respectfully pray that this court enter  
judgment,

24. Granting plaintiff Howell a declaration that the acts and  
omissions described herein violate her rights under the  
Constitution and laws of the United States, and,

25. A preliminary and permanent injunction ordering defendant  
Gettinger to cease discussion of confidential information with  
inappropriate personnel and offenders.

26. Granting Plaintiff Howell compensatory damages in the amount of \$75,000.
27. Granting Plaintiff Howell nominal and punitive damages in the amount of \$10,000.
28. Plaintiff seeks a jury trial on all issues triable by jury.
29. Plaintiff also seek recovery of costs in this suit, and any additional relief this court finds just, proper, and equitable.

Dated: "

Respectfully submitted, Alexander Howell

#1364452

Petosi Correctional Center

11595 State Highway 0

Mineral Point, MO

#### Verification

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and, as to those, I believe them to be true. I certify under penalty of perjury that the foregoing is true and correct.

Executed at ~~old~~ Mineral Point, Missouri on

Alexander Howell

Alexander Howell

## Injuries

sustained was exacerbation in depression, insomnia, and intentional infliction of emotional distress, and  
sabotaged

## Filing (Exhaustion of Remedies)

- done in Petossi Correctional Center
- covered the claims of violating the 14th and 8th amendments and the Hippie law
- IRR / grievance filed
- denied

## Cases

- no cases dismissed under "three strikes rule"
- have filed in state courts before:
  - 4:22-cv-00218-RLW
  - US District Courts
  - Eastern District of Mo
  - Judge Ronnie L. White